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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from October 30, 2023 to December 29, 2023, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT . All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due

1 on the same week. For the weeks of October 23, 2023 and October 30, 2023,
2 Counsel has seventeen merit briefs, a reply briefs, and a Plaintiff's Settlement
3 Proposal due. Counsel requires additional time to brief the issues thoroughly for
4 the Court's consideration. Defendant does not oppose the requested extension.
5 Counsel apologizes to the Defendant and Court for any inconvenience this may
6 cause.

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8 Respectfully submitted,

9 Dated: October 12, 2023 PENA & BROMBERG, ATTORNEYS AT LAW
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11 By: /s/ Dolly M. Trompeter
12 DOLLY M. TROMPETER
13 Attorneys for Plaintiff

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15 Dated: October 12, 2023 PHILLIP A. TALBERT
16 United States Attorney
17 PETER K. THOMPSON
18 Acting Regional Chief Counsel, Region IX
19 Social Security Administration

20 By: */s/ Franco L. Bacia
21 Franco L. Bacia
22 Special Assistant United States Attorney
23 Attorneys for Defendant
24 (*As authorized by email on October 12, 2023)

ORDER

Pursuant to the parties' stipulation, and cause appearing, Plaintiff's deadline to file a motion for summary judgment is extended to December 29, 2023. All other deadlines in the Court's Scheduling Order are modified accordingly. The parties are advised that no further extensions of time will be granted absent a demonstrated showing of good cause.

IT IS SO ORDERED

Dated: **October 16, 2023**

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE